

EXHIBIT A

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Case No.: 5:20-cv-03664-LHK

**[PROPOSED] ORDER RE: PRIVILEGE
 LOG DISPUTE**

The Honorable Susan van Keulen
 Courtroom 6 - 4th Floor

[PROPOSED] ORDER

Before the Court is the parties' Joint Submission Re: Google Privilege Log Dispute. ("Joint Submission"). Having considered the parties' Joint Submission, and good cause having been shown, the Court **ORDERS** as follows:

- Google shall designate a senior attorney to (i) re-review the privilege log entries challenged by Plaintiffs; (ii) revise the privilege log to identify with particularity the counsel whose legal advice is purportedly at issue and describe with greater specificity the nature of the privileged material withheld in each document (as opposed to, for example, Google's inaccurate, boilerplate descriptions of "Memoranda" reflecting legal advice); (iii) produce any documents that, upon further review, are not privileged; and (iv) submit a declaration confirming that there is a factual and legal basis for withholding the remaining documents as privileged. Google shall do so within one week of this order; and
- After that review is complete, Plaintiffs may select a sample of Google's withheld or redacted documents for in camera review by the Court (which then may provide further grounds for resolving of Google's remaining privilege claims).

IT IS SO ORDERED.

DATED: _____

Honorable Susan van Keulen
United States Magistrate District Judge